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25 UNITED STATES DISTRICT COURT
26 FOR THE NORTHERN DISTRICT OF CALIFORNIA
27 SAN FRANCISCO DIVISION

28 AMERICAN FEDERATION OF
GOVERNMENT EMPLOYEES, AFL-CIO,
et al.,

Plaintiffs,

v.

DONALD J. TRUMP, in his official capacity
as President of the United States, et al.,

Defendants.

Case No. 3:25-cv-03698-SI

**SECOND SUPPLEMENTAL
DECLARATION OF SARAH HUNTER**

DECLARATION OF SARAH HUNTER

I, Sarah Hunter, declare as follows:

1. I am over 18 years of age and competent to give this declaration. This declaration is based on my personal knowledge, information, and belief.

2. I am steward of the American Federation of Government Employees Local 1534 (“Local 1534” or “Union”), which represents a bargaining unit of employees at the United States Department of State (“State Department”), and offer this declaration in that capacity. I previously provided two declarations in this case (Dkts. 37-20, 96-2).

3. I understand that on April 27, 2025, Secretary of State Marco Rubio was interviewed by Kristen Welker of NBC Meet the Press. Attached hereto as Exhibit A is a true and correct copy of the transcript of that interview that was published on the State Department website at <https://www.state.gov/releases/office-of-the-spokesperson/2025/04/interview-secretary-of-state-marco-rubio-with-kristen-welker-of-nbc-meet-the-press/>. According to this transcript, during the interview, Secretary Rubio stated that: “[T]his is a reorganization that should have been done 10, 15 years ago. Multiple secretaries of state from both – appointed by presidents both Democrat and Republican would have loved to have done it. I just happen to be fortunate to work for a president that allowed us to do it, that actually asked us to do it, and I’m excited about it.”

4. Attached hereto as Exhibit B is a redacted copy of an email sent on Friday, February 21, 2025, from a Senior Advisor at the State Department’s Bureau of Global Talent Management (GTM) to Executive Offices with the subject line “Subject: Action Request - EO re: DOGE Workforce Optimization.”

5. Attached hereto as Exhibit C is a redacted copy of an email sent on Thursday, April 24, 2025, from a State Department Human Resources Officer to employees of the State Department’s Counter Foreign Information Manipulation and Interference (R/FIMI) regarding the RIF notice period for those employees.

1 I declare under penalty of perjury under the laws of the United States that the foregoing is
2 true and correct. Executed June 11, 2025, in Washington, D.C.

3
4
5 
Sarah Hunter

Exhibit A



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U.S. DEPARTMENT *of* STATE



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Secretary of State Marco Rubio With Kristen Welker of NBC Meet the Press

INTERVIEW

MARCO RUBIO, SECRETARY OF STATE
WASHINGTON, D.C.

APRIL 27, 2025

QUESTION: And joining me now is Secretary of State Marco Rubio. Secretary Rubio, welcome back to Meet the Press.

SECRETARY RUBIO: Good morning. Thanks.

QUESTION: Well, good morning to you. Thank you so much for being here. President Trump is about to mark his 100th day in office. It comes as a key campaign promise is to end the war in Ukraine and against the backdrop of that extraordinary meeting between President Trump and President Zelenskyy. Mr. Secretary, is Russia and Ukraine now closer to a deal in the wake of that meeting?

SECRETARY RUBIO: Well, I think they're closer in general than they've been any time in the last three years, but it's still not there. And as I said and he has said and others have said, he's done an extraordinary job at the highest levels of our government. The President has put out everybody you can imagine – Ambassador Witkoff, myself, the National Security Advisor, the Vice President – been involved and engaged in this effort to bring the two sides closer so we can have a path to peace.

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By the way, that's something that should be celebrated. He's trying to end a three-year war that has no military solution, where every day people are dying, especially on the Ukrainian side, in many cases civilians and children, as we've seen the images over the last few weeks. He's trying to bring this war to an end. And we've made real progress. But those last couple steps of this journey were always going to be the hardest ones, and it needs to happen soon. We cannot continue, as I said, to dedicate time and resources to this effort if it's not going to come to fruition.

So the last week has really been about figuring out how close are these sides really, and are they close enough that this merits a continued investment of our time as a mediator in this regard.

QUESTION: What is the timeline? Are you talking weeks or months? How long are you willing to give them to reach a peace agreement?

SECRETARY RUBIO: Well, I always think it's silly to set a specific date or whatever. But I can just tell you that almost a hundred days into this presidency, the President has dedicated a tremendous amount of time and energy to this, and we think we've brought the sides closer than they've been in a very long time. But we're not there yet, and it needs to start happening. We need to start – I think this is going to be a very critical week. This week is going to be a really important week in which we have to make a determination about whether this is an endeavor that we want to continue to be involved in, or if it's time to sort of focus on some other issues that are equally if not more important in some cases.

But we want to see it happen. There are reasons to be optimistic, but there are reasons to be realistic, of course, as well. We're close but we're not close enough.

QUESTION: Let's talk about what we've heard from and seen from President Trump online, who now says he wants to deal with President Putin quote "differently" through banking or secondary sanctions. Will President Trump follow through with imposing new sanctions against Russia?

SECRETARY RUBIO: Well, first of all, I'm not going to – the President – we have multiple options, frankly, to address this and to deal with all of this, but we don't want to get to that point. This is still not the time. I think what the President is saying, and has been saying for

some time now, is he is aware that he has these options – people ask him about it all the time – but what he really wants is a peace deal. He wants the dying and the killing to stop.

This is a terrible war. It's cost the lives of thousands of people. Billions of dollars and generational destruction on the – especially on the Ukrainian side. We want the war to end. You saw yesterday at the Pope's mass there was talk about war and how it needed to stop. The Pope – the late Pope was celebrated for being a peacemaker and trying to talk about these things. We should all be happy that we have a president of the United States in Donald J. Trump who wants to end and prevent wars, and that's what we're trying to do here.

And so ultimately, look, if it doesn't happen, it doesn't come to fruition, then as a nation-state there are options that we have for those who we hold responsible for not wanting the peace. But we prefer not to get to that stage yet because we think it closes the door to diplomacy.

QUESTION: Well, the President has made a number of demands against Ukraine. Just last month the President told me he might impose penalties against Russia. I guess given the frustrations that he is voicing, Mr. Secretary, why hasn't he imposed sanctions yet?

SECRETARY RUBIO: Well, because I think we're still hoping to see that this effort works out in diplomacy and that we can bring these two sides closer together. I mean, the minute you start doing that kind of stuff, you're walking away – you're walking away from it. You've now doomed yourself to another two years of war, and we don't want to see it happen.

I think what's important and really weighs is there is no other country, there is no other institution or organization on the earth, that can bring these two sides together. No one else is talking to both sides but us, and no one else in the world can make something like this happen but the President.

This is a very significant responsibility and a really important opportunity, and we want to make sure that we work it all the way through, that we don't walk away from something that can actually work or that can actually lead to peace. But we also don't want to continue to spend time on something that's not going to get us there. So throughout this process, it's about determining do both sides really want peace, and how close are they or

how far apart they are after 90 days of effort here, over 90 days of effort. That's what we're trying to determine this week.

There are reasons to be optimistic, and there are also reasons to be concerned. It's complicated. If this was an easy war to end, it would have been ended by someone else a long time ago. But right now, the only one who can bring these two sides together to end this war is our president, President Trump, and we're doing everything we can to see if we can get that done here over the next few days.

QUESTION: But let me ask you about some of the language you've taken. Just three years ago you co-sponsored a Senate bill barring the United States from recognizing Russian claims to any portion of Ukraine's land. Let me read you part of what you said. Quote:

"Vladimir Putin is the real aggressor in this war, and he is attempting an unjustified takeover of a sovereign democratic country. The United States cannot recognize Putin's claims or we risk establishing a dangerous precedent for other authoritarian regimes like the Chinese Communist Party to imitate. What message does it send to China and other adversaries if the United States allows Russia to keep the land it's illegally claimed?"

SECRETARY RUBIO: Well, first of all, I would say that right now there's a lot of press reports about this, that, or these concessions or that concession. A lot of things have been discussed. And the reason why those things are being discussed is very simple, not because we're going to force anyone to do anything or pressure anyone to do anything like this, but because we need to understand what are the options to bringing about an end to the war. We need to be grownups and realistic here. In any negotiated end to a war, both sides get something and both sides have to give something up. That's a reality.

Without speaking specifically about that or another, you wrote a – you talk about – that was back in September of 2022. Since September of 2022, this war has continued. Thousands of more people have died, generational destruction that Ukraine's going to spend two generations rebuilding from. This is a war that needs to end now.

And so in order for this war to end, there are things Russia wants that it will not get, and there are things Ukraine wants that it will not get. If it wasn't the case, that would have been done a long time ago. No one here is claiming that one side is going to

unconditionally surrender to the other and bring this to an end, but that's why diplomacy can be difficult and time-consuming, but it is the only way to end this conflict.

There is no military solution to this war. The only solution to this war is a negotiated settlement where both sides are going to have to give up something they claim to want and are going to have to give the other side something they wish they didn't. That's how you end wars and that's what we're trying to achieve here so more people won't die. There are people who will die today in this war because there is no peace. We don't want to continue to have to say that. Every time you turn on the news and they said, well, another missile strike, another – all these things will continue to happen. This could get even worse in the months to come.

QUESTION: Yeah. President Putin has never acknowledged Ukraine's right to exist, so why do you trust that he won't invade Ukraine again or another European country?

SECRETARY RUBIO: Well, I don't think peace deals are built on trust. I think peace deals have to be built on verification, have to be built on facts, have to be built on action, have to be built on realities. So this is not an issue of, well, we're – of trust. It's an issue of building in these sorts of things – verification, security guarantees, things that have been discussed in the past. All these things are being talked about here, all of these things.

QUESTION: Yeah.

SECRETARY RUBIO: But right now its not the time – we're trying to bring two sides together. The last thing you want to do is give some side – one of the two sides an excuse to walk away from this effort. We're just trying to achieve peace. At the end of the day, let me remind everybody what we are trying to do is end a war that has cost a lot of money to us, to our allies; cost a lot of lives; destroyed a lot of lives; forced people by the millions to leave their country, millions of Ukrainians that no longer live in the country and have not been able to come back. We just want all this stop, and we're trying to find whether we can play a role to make that happen.

I hope – everyone should hope that we're successful. Instead of rooting against President Trump, everyone should be hopeful that President Trump can bring this war to an end because it truly at this point is not good for anybody. It may not work out. Peace deals are hard. But we are trying, and I think the President deserves credit for spending this much

time and this much energy and these many resources to try to bring about this outcome of peace.

QUESTION: All right, Mr. Secretary, let's turn to China and the President's trade war. President Trump said he has spoken directly with President Xi Jinping. Chinese officials, though, say that no talks have taken place about a trade war. Can you help us to understand where this stands? Has President Trump spoken to President Xi after imposing those 145 percent tariffs?

SECRETARY RUBIO: Well, I mean, just like the previous answer, I think I'm not going to be commenting on who talked to who and what they talked about, because obviously this is also a high-stakes negotiation. The fundamental fact is this: For 30-something years, the Chinese have gotten away with unfair trade practices – not just unfair, outrageously unfair trade practices.

QUESTION: Yeah.

SECRETARY RUBIO: It's just very simple. Chinese companies can do whatever they want in America. American companies can only do what the Chinese allow them to do in China, and it's very limited, and every year it gets more and more limited. They flood not just us but they flood the world with exports, but they push back against any imports. They are 100 percent favorable to their – unfairly favorable to their companies and unfair to ours.

They steal our intellectual property. They reverse-engineer things they get ahold of. I mean, it's on and on and on unfair, and they've been allowed to get away with it. And finally – almost too late, really, but finally – we have a president that stood up to it.

And it's not just us that needs to be standing up to it, by the way. Europe is concerned about the number of electric cars that China tried to dump on them. China has had trade problems with Canada and with others. This needs to stop.

So the bottom line is that the President is dealing with something that should have been dealt with a very long time ago, and it was almost too late.

QUESTION: So, Mr. Secretary, just to be clear, you can't confirm that a phone call has taken place between President Trump and President Xi of China post the —

SECRETARY RUBIO: Well, I don't comment on the phone calls the President makes —

QUESTION: Okay.

SECRETARY RUBIO: — with foreign leaders.

QUESTION: All right. Sorry.

SECRETARY RUBIO: Yeah, I think I'd direct you to the White House.

QUESTION: Okay.

SECRETARY RUBIO: It's for the President to tell you who he's talked to. I'm not going to get in the way of those negotiations.

QUESTION: Okay. Let's talk now about some new reporting that came in overnight. I want to just go through it for you and for our audience. Three U.S. citizen children have been deported with their mothers. Now, this is according to *The Washington Post*. The family's lawyer says one of them is a four-year-old with stage four cancer deported without medication or ability to contact doctors. The family's lawyers are also saying their clients were denied communication with family and legal representatives before being deported, and it's raising concerns about the issue of due process, that it's being violated.

So let me ask you: Is everyone on U.S. soil, citizens and non-citizens, entitled to due process?

SECRETARY RUBIO: Yes, of course. But let me tell you it looks – in immigration standing, the laws are very specific. If you're in this country unlawfully, you have no right to be here, and you must be removed. That's what the law says.

Somehow, over the last 20 years, we've completely lost this notion that somehow – or completely adopted this idea that, yes, we have immigration laws but once you come into our country illegally it triggers all kinds of rights that can keep you here indefinitely. That's why we were being flooded at the border. And we've ended that, and that's why you don't – you see a historically low number of people not just trying to cross our border but trying to cross the border into Panama all the way down in the Darién Gap. I mean, it's been a huge help for those countries as well.

On the headline, that's a misleading headline, okay? Three U.S. citizens ages four, seven, and two were not deported. Their mothers, who are illegally in this country, were deported. The children went with their mothers. Those children are U.S. citizens. They can come back into the United States if there's their father or someone here who wants to assume them.

QUESTION: Yeah.

SECRETARY RUBIO: But ultimately, who was deported was their mother – was their mothers, who were here illegally. The children just went with their mothers. But it wasn't like – you guys make it sound like ICE agents kicked down the door and grabbed the two-year-old and threw him on an airplane. That's misleading.

QUESTION: Yeah.

SECRETARY RUBIO: That's just not true.

QUESTION: Just to be clear, because I do want to get to the overhaul at the State Department, is it the U.S. policy to deport children, even U.S. citizens, with their families – and I hear what you're saying – without due process? Just let's be very clear there.

SECRETARY RUBIO: Well, no, no, no. Again, if someone is in this country unlawfully, illegally, that person gets deported. If that person is with a two-year-old child or has a two-year-old child and says, I want to take my child with you – with me, well, then what? You have two choices. You can say yes, of course you can take your child, whether they're a citizen or not, because it's your child; or you can say yes, you can go, but your child must stay behind. And then your headlines would read: "U.S. Holding Hostage Two-Year-Old, Four-Year-Old, Seven-Year-Old, While Mother Deported."

So the mother – the parents make that choice. I imagine those three U.S. citizen children have fathers here in the United States. They can stay with their father. That's up to their family to decide where the children go. Children go with their parents. Parents decide where their children go.

QUESTION: Okay.

SECRETARY RUBIO: The U.S. deported their mothers, who were illegally in America.

QUESTION: Mr. Secretary, I want to talk to you about this overhaul of the State Department. You slashed U.S.-based employees by 15 percent, actually less than what the White House was recommending, which was about 50 percent, it's my understanding. Are you finished with the cuts, or are more coming?

SECRETARY RUBIO: We haven't slashed anything yet. What we did is reorganize the agencies because we have a – the world, the globe, the planet, is the exact same size that it was 20 years ago, but the State Department is somehow almost double the size. So the world hasn't gotten any bigger, but somehow the State Department continues to grow.

But this is not just about saving money. This is about – primarily about making sure that every bureau and every office in the State Department has a purpose and it's fulfilling them and they work together. What this really is about is empowering what's called the regional bureaus and our embassies. We want to return more power and more influence and more responsibility to our embassies and to the regional bureaus that oversee those embassies. That's what this reorganization is about.

The 15 percent you're referring to is, after we've reorganized, we're going to ask that the bureau heads and the assistant secretaries, many of whom are career Foreign Service officers, to look at their bureaus and at their operations and suggest to us 15 percent reductions, suggest to us 15 percent reductions. Then we'll look at that. That's not an unreasonable number.

But this is a reorganization that should have been done 10, 15 years ago. Multiple secretaries of state from both – appointed by presidents both Democrat and Republican would have loved to have done it. I just happen to be fortunate to work for a president that allowed us to do it, that actually asked us to do it, and I'm excited about it. I think it's going to make the State Department more nimble, more effective, and it's going to empower our very talented diplomats to finally be able to do their jobs in ways they've been held back from doing in the past because of bureaucracy and redundancy within the State Department.

QUESTION: Mr. Secretary, very quickly because we're out of time already, but Canadians, as you know, head to the polls tomorrow for their parliamentary elections. Have you taken any steps to carry out President Trump's plans? He says he wants to annex Canada.

SECRETARY RUBIO: Any what? I'm sorry.

QUESTION: Any plans to carry out —

SECRETARY RUBIO: I missed the last part of your question.

QUESTION: Absolutely. I'll repeat it. Have you taken any steps to carry out President Trump's plans, as he has said he would like to annex Canada? Have you taken any steps in that direction?

SECRETARY RUBIO: No, I think what the — no, no, what the President has said, and he has said this repeatedly, is he was told by the previous prime minister that Canada could not survive without unfair trade with the United States, at which point he asked, well, if you can't survive as a nation without treating us unfairly in trade, then you should become a state. That's what he said.

They'll have their elections this week. They're going to have a new leader and we'll deal with the new leadership of Canada. There are many things we work with cooperatively on Canada on, but we actually don't like the way they treated us when it comes to trade. And the President has made that point when he responded to the previous prime minister in regards to this.

QUESTION: So does the President — does the U.S. — still want to make Canada the 51st state?

SECRETARY RUBIO: I think the President has stated repeatedly he thinks Canada would be better off as a state. I mean, and he has said that based on what he was told by the previous prime minister, who said Canada can't survive unless it treats the U.S. unfairly in trade.

QUESTION: All right, okay. Secretary of State Marco Rubio, thank you so much. We covered a lot of ground today. Really appreciate your joining us.

SECRETARY RUBIO: Thank you.

[Canada](#)

[China](#)

[Office of the Spokesperson](#)

[Russia](#)

[The Secretary of State](#)

[Ukraine](#)



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Exhibit B

From: [REDACTED]@state.gov>
Sent: Friday, February 21, 2025 4:26 PM
To: GTM Bureau-Exec Directors <[REDACTED]@state.gov>
Cc: DGTM-Workforce Innovation <[REDACTED]@state.gov>
Subject: Action Request - EO re: DOGE Workforce Optimization

EX Offices:

The President's Executive Order of February 11, 2025 entitled: [Implementing the President's "Department of Government Efficiency" Workforce Optimization Initiative](#) requires agencies to submit to the Director of OMB a report that identifies any statutes that establish the agency, or subcomponents of the agency, as statutorily required entities. The report shall discuss whether the agency or any of its subcomponents should be eliminated or consolidated.

ACTION REQUIRED:

1. In support of this tasking, all EX Offices are asked to complete the attached template regarding the statutory basis for bureaus, offices, and subcomponents and submit it to the Director General's Innovation Unit (DGTM/IU), copied on this message, **no later than COB Wednesday, February 26.**
2. GTM has tentatively identified bureaus'/offices' statutory bases and is happy to share these preliminary bureau-specific findings with you. Note that these may not be fully accurate or complete and bureaus should review them carefully before importing any of this data into the template. **Please contact [REDACTED] in DGTM/IU with a bureau POC(s) with whom you would like us to share this preliminary data.**

Please contact DGTM-Workforce Innovation in the GAL, or me specifically, with any questions.

Thanks for your help. And sorry to hit you with this late on a Friday.

[REDACTED]

[REDACTED]

Senior Advisor to the Director General, and Director for Workforce Innovation

Bureau of Global Talent Management (GTM)

[REDACTED]

SENSITIVE BUT UNCLASSIFIED

Exhibit C

From: [REDACTED]@state.gov>

Date: Thu, Apr 24, 2025, 3:46 PM

Subject: RE: [External] RIF period of notice - R/FIMI employees

To: [REDACTED], GTM-CSTM-SCP <GTM-CSTM-SCP@state.gov>

Cc: [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED],

Thanks, you for your e-mail. Please see points below as to why R/FIMI employees were provided 30 days instead of 60 days.

- The Department determined that an immediate cessation of any activities and closure of the Office is necessary in order to comply with Executive Order 14149, titled "Restoring Freedom of Speech and Ending Federal Censorship."
- Also, this cessation aligns to the Department's projected plans in compliance with Executive Order 14210, "Implementing the President's 'Department of Government Efficiency' Workforce Optimization Initiative."
- The Department consequently requested and received approval from OPM permission to provide less than 60 days' notice for the Reduction in Force.



[REDACTED]
Human Resources Officer and Shared Service Provider

U.S. Department of State, Bureau of Educational & Cultural Affairs

Executive Office (ECA/EX/HR)

[REDACTED]
SA-05 | C1

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